

FILED

June 30, 1980

**NEW JERSEY STATE BOARD
OF MEDICAL EXAMINERS**

WILENTZ, GOLDMAN & SPITZER
900 Route 9
P. O. Box 10
Woodbridge, New Jersey 07095
(201) 636-8000
Attorneys for Respondent

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF MEDICAL EXAMINERS
DOCKET NO. H-80-5052

In the Matter of the Suspension) Administrative Action
or Revocation of the License of

RONALD S. MUELLER, D.C.)
License No. 1295

ANSWER

To Practice Chiropractic in)
the State of New Jersey

)

RONALD S. MUELLER, D.C., by way of Jack Venturi, Esq.,
of the firm of Wilentz, Goldman & Spitzer, A Professional
Corporation, with offices located at 900 Route 9, P. O. Box 10,
Woodbridge, New Jersey 07095, on the basis of information and
belief, by way of Answer says:

COUNT I

1. Respondent lacks information necessary to admit
or deny the allegation of paragraph #1.

2. Respondent lacks information necessary to admit
or deny the allegation of paragraph #2.

3. Respondent admits the allegations of paragraph #3.
4. Respondent **denies** the allegations of paragraph #4.

COUNT II

1. The Respondent repeats each and every answer contained in Count I as if fully stated herein, or fully incorporated by reference.
2. Respondent denies the allegations of paragraph #2.

COUNT III

1. The Respondent repeats each and every answer contained in Counts I and II, as if fully stated herein, or fully incorporated by reference.
2. Respondent denies the allegations of paragraph #2.

COUNT IV

1. The Respondent repeats each and every answer contained in Counts I, II, III, as if fully stated herein, or fully incorporated by reference.
2. Respondent denies the allegations of paragraph #2.

COUNT V

1. The Respondent repeats each and every answer contained in Counts I, II, III, and IV, as if fully stated herein, or fully incorporated by reference.

2. Respondent denies the allegations of paragraph #2.

WHEREFORE, Respondent demands judgment against the Complainant and dismissal of this lawsuit, together with costs.

In addition to his answers, Respondent raises the following affirmative defenses:

FIRST AFFIRMATIVE DEFENSE

The complaint is barred since Respondent has not been afforded due process and has not received a speedy hearing, and has been prejudiced thereby.

SECOND AFFIRMATIVE DEFENSE

The complaint is barred by Estoppel.

THIRD AFFIRMATIVE DEFENSE

The complaint is barred by Laches.

FOURTH AFFIRMATIVE DEFENSE

The complaint is barred because it is not before the appropriate forum.

WILENTZ, GOLDMAN & SPITZER
Attorneys for Respondent

BY: 

JACK VENTURI

Dated: June 18, 1980



State of New Jersey

DEPARTMENT OF LAW AND PUBLIC SAFETY

DIVISION OF LAW

CONSUMER AFFAIRS & ENERGY SECTION

1100 RAYMOND BOULEVARD
NEWARK, N.J. 07102

TELEPHONE (201) 648-2888

JOHN J. DEGNAN
ATTORNEY GENERAL

JUDITH A. YASKIN
FIRST ASSISTANT ATTORNEY GENERAL

STEPHEN SKILLMAN
ASSISTANT ATTORNEY GENERAL
DIRECTOR

~~XXXXXXXXXXXX~~
DEPUTY ATTORNEY GENERAL
SECTION CHIEF

June 20, 1980

Melissa Demko
N.J. State Board of Medical Examiners
28 West State Street
Trenton, N. J. 08625

RE: I/M/O Ronald S. Mueller, D.C.
License No. 1295
Docket No. H-80-5052

Dear Melissa:

Enclosed please find the original and one copy of the answer to complaint in the above matter. Please file it with the Board, send a copy to defense counsel in the enclosed envelope and a copy for my records.

Very truly yours,

JOHN J. DEGNAN
ATTORNEY GENERAL

BY Mary Andruzzi
Mary Andruzzi
Deputy Attorney General

MA/dmk
Enc.